

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

PATRICIA KEECH and DAVID NEWFIELD, )  
on behalf of themselves and all others similarly )  
situated, )  
  )  
Plaintiffs,   ) Case No.: 18-cv-00683-JRT-HB  
  )  
vs.    )  
  )  
SANIMAX USA, LLC,                                   )  
  )  
Defendant.    )

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, AND APPOINTMENT  
OF CLASS REPRESENTATIVES AND CLASS COUNSEL**

Plaintiffs Patricia Keech and David Newfield, by and through their counsel, and on behalf of themselves and all other class members, respectfully move this Court for entry of an order granting Final Approval of Class Action Settlement (**ECF No. 63-1**, Settlement Agreement) under Rule 23(e) of the Federal Rules of Civil Procedure. Plaintiffs also move under Rule 54(d) for an award of attorneys' fees and costs.

Following this Court's February 3, 2020 order granting preliminary approval of the Settlement Agreement, Plaintiffs request that the Court: (1) grant final approval of the Settlement as fair, reasonable, and adequate based on the terms set forth in the Settlement Agreement; (2) finally certify the Class for settlement purposes only; (3) finally appoint the Plaintiffs as class representatives and grant the requested service awards; (4) finally appoint Plaintiffs' counsel, Steven Liddle and Laura Sheets of Liddle & Dubin, P.C. and Jeffrey S. Storms and Newmark Storms Dworak LLC as Class Counsel; (5) approve the release of claims against Defendant as defined in the Settlement Agreement; (6) authorize the parties to carry out the settlement and perform in accordance with the terms of the Settlement Agreement; (7) overrule all objections to

the Settlement; (8) dismiss Plaintiffs' claims with prejudice, while retaining jurisdiction over the interpretation, enforcement, and implementation of the Settlement Agreement and the Court's Order finally approving the Settlement; and (9) grant Class Counsel's request for reasonable attorneys' fees, expenses, and class representative incentive awards.

**WHEREFORE**, and for the reasons stated in the accompanying brief, Plaintiffs request that the Court grant the relief requested above and enter the proposed order granting final approval.

Dated: May 11, 2020

Respectfully submitted,

LIDDLE & DUBIN, P.C.

s/ Laura L. Sheets

Steven D. Liddle (P45110) (admitted pro hac vice)  
Laura L. Sheets (P63270) (admitted pro hac vice)  
975 East Jefferson Avenue  
Detroit, Michigan 48207-3101  
Tel: (313) 392-0015  
Fax: (313) 392-0025  
SLiddle@mldclassaction.com  
LSheets@mldclassaction.com

**NEWMARK STORMS DWORAK LLC**

/s/ Jeffrey S. Storms

Jeffrey S. Storms (#0387240)  
100 South Fifth St., Suite 2100  
Minneapolis, MN 55402  
Telephone: (612) 455-7050  
Fax: (612) 455-7051  
jeff@newmarkstorms.com

*Attorneys for Named Plaintiffs*